

1 MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
2 ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
3 MORRISON & FOERSTER LLP
425 Market Street
4 San Francisco, California 94105-2482
Tel: 415.268.7000 / Fax: 415.268.7522

5 KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsfllp.com
6 HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsfllp.com
7 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
8 Washington DC 20005
Tel: 202.237.2727 / Fax: 202.237.6131

10 WILLIAM CARMODY (*Pro Hac Vice*)
bcarmody@susmangodfrey.com
11 SHAWN RABIN (*Pro Hac Vice*)
srabin@SusmanGodfrey.com
12 SUSMAN GODFREY LLP
1301 Avenue of the Americas, 32nd Floor
13 New York, NY 10019-6023
Tel: 212.336.8330 / Fax: 212.336.8340

14 Attorneys for Defendants
15 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,
20
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,
24 Defendant.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
IAN M. GORE IN SUPPORT OF
DEFENDANTS' UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S MOTION IN
LIMINE NO. 27 TO EXCLUDE
DR. HESSELINK'S SAVED
DEVELOPMENT TIME OPINIONS**

Courtroom: 8, 19th Floor
Judge: The Honorable William Alsup
Trial Date: December 4, 2017

1 I, Ian M. Gore, declare as follows:

2 1. I am an associate with the law firm of Susman Godfrey LLP. I am a member in
3 good standing of the Bar of the State of New York. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and
6 Ottomotto LLC's Motion in Limine No. 27 to Exclude Dr. Hesselink's Saved Development Time
7 Opinions.

8 2. Attached as **Exhibit 1** is a true and correct copy of excerpts from the transcript of
9 the September 22, 2017 deposition of Michael J. Wagner.

10 3. Attached as **Exhibit 2** is a true and correct copy of excerpts from the transcript of
11 the September 26, 2017 deposition of Lambertus Hesselink, Ph.D.

12 4. Attached as **Exhibit 3** is a true and correct copy of excerpts from the August 24,
13 2017 Opening Expert Report of Lambertus Hesselink, Ph.D.

14 5. Attached as **Exhibit 4** is a true and correct copy of excerpts from the September
15 14, 2017 Reply Expert Report of Lambertus Hesselink, Ph.D.

16 6. Attached as **Exhibit 5** is a true and correct copy of excerpts from the September
17 14, 2017 Expert Reply Report of Michael J. Wagner.

18 7. Attached as **Exhibit 6** is a true and correct copy of the Curriculum Vitae of
19 Professor Lambertus Hesselink, Ph.D.

20 I declare under penalty of perjury under the laws of the United States that the foregoing is
21 true and correct. Executed this 13th day of November, 2017, at New York, New York.

22
23 /s/ Ian M. Gore

24 Ian M. Gore
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27
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ATTESTATION OF E-FILED SIGNATURE

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Ian M. Gore has concurred in this filing.

Dated: November 13, 2017

/s/ Michael A. Jacobs

MICHAEL A. JACOBS